

## Annual 47 CFR § 64.2009(e) CPNI Certification

## EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2018 covering the prior calendar year 2017

Date filed: 02/22/2018

Name of company covered by this certification: BestWeb Corporation / BestWeb CLEC

Form 499 Filer ID: 826242

Name of signatory: Mark Dickey

Title of signatory: President

Certification:

I, Mark Dickey, certify that I am an officer of the company named above, and acting as an agent of said company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. S: 64.2001 et seq.

These procedures are summarized by the fact that all call record information is only provided to the address of record which is establish in writing by the customer at the point of contract signing, or updated thereafter in writing by an authorized customer contact. The records can only be discussed when presented by the customer. No online access to the records is ever provided. If the customer expresses an urgent situation that requires immediate access to call records, BestWeb will contact the customer at an authorized telephone number of record and speak only to a known authorized customer contact.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 CFR § 1.17, which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed Mark Dickey

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Implementation of the Telecommunications Act of 1996: Telecommunications Carriers' Use of Customer Proprietary Network Information and Other Customer Information; IP-Enabled Services, CC Docket No. 96-115; WC Docket No. 04-36, Report and Order and Further Notice of Proposed Rulemaking, 22 FCC Rcd 6927 (2007) ("EPIC CPNI Order").

See 47 U.S.C. S: 222.

47 C.F.R. S: 64.2009(e) states: "A telecommunications carrier must have an officer, as an agent of the carrier, sign and file with the Commission a compliance certificate on an annual basis. The officer must state in the certification that he or she has personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the rules in this subpart. The carrier must provide a statement accompanying the certification explaining how its operating procedures ensure that it is or is not in compliance with the rules in this subpart. In addition, the carrier must include an explanation of any actions taken against data brokers and a summary of all customer complaints received in the past year concerning the unauthorized release of CPNI. This filing must be made annually with the Enforcement Bureau on or before March 1 in EB Docket No. 06-36, for data pertaining to the previous calendar year."